



## MEMORANDUM

TO: United States Department of Energy (DOE), Via Email, [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov)

FROM: Spencer Stock, Product Marketing Manager, Lester Electrical

DATE: June 18, 2012

RE: Ex Parte Communications, Docket Number EERE-2008-BT-STD-0005, RIN 1904-AB57

On Monday, June 11, 2012, representatives from Lester Electrical and Ingersoll Rand met with DOE to discuss the Notice of Proposed Rulemaking (NOPR) for Energy Conservation Standards for Battery Chargers and External Power Supplies, Docket Number EERE-2008-BT-STD-0005, RIN 1904-AB57.

The following participants were present.

John Cymbalsky, DOE  
Jeremy Domm, DOE  
Michael Kido, DOE

Luke Prussa, Lester Electrical  
Spencer Stock, Lester Electrical  
Jordan Doria, Ingersoll Rand

The following topics were discussed during the meeting.

1. DOE staff stated that they had reviewed the written comments submitted by Lester Electrical. They requested the submittal of additional data regarding the Lester Electrical claim that the NOPR Average Installed Price data for Product Class 7 CSL 0 is incorrect, as well as data regarding product lifetimes, product reliability, and consumer utility.
2. Lester Electrical reiterated their comments from the public meeting and written comments that they believe that golf car battery charger systems are not consumer products and, as such, should not be regulated by the proposed standards.
3. Lester Electrical discussed the fact that golf car battery charger systems are much closer in design and construction to battery charger systems for use with other commercial or industrial equipment, such as material handling equipment (e.g., lift trucks), industrial/utility vehicles, aerial work platforms (e.g., scissor lifts and boom lifts), and floor machines, than battery charger systems sold primarily and principally for personal use or consumption.
4. Lester Electrical discussed the fact that golf cars themselves share very few similarities in design and construction with the battery-powered products regulated by the proposed standards that are sold primarily and principally for personal use or consumption. However, golf cars are almost indistinguishable in design and construction from low-speed vehicles (LSVs), which are specifically excluded from the proposed standards. In fact, the additional safety features that are required for a vehicle to be classified as an LSV can optionally be added to golf cars as factory options or in the aftermarket.
5. DOE staff reiterated their position that they consider golf car battery charger systems to be consumer products primarily because approximately 10 percent of new golf cars are sold to individuals for personal use.
6. Ingersoll Rand reiterated their written comments that they believe that if the four (4) factors outlined in the DOE FAQ on the topic are evaluated for golf cars, only one (1) of which is distribution of shipments of the product type and the basic model, that golf cars are not "of a type" that make them a consumer product.

7. Lester Electrical asked that DOE carefully consider the case of LSVs, as well as the fact that other commercial/industrial electric vehicles, such as lift trucks, are also sold in some quantity to individuals for personal use, though they are primarily distributed to commercial/industrial businesses, in a very similar manner to golf cars.
8. In response to the question from Lester Electrical, DOE staff acknowledged that there is no mandate from Congress, or any statutes, that state that golf cars are themselves consumer products. This determination will be made by DOE.
9. Both Lester Electrical and Ingersoll Rand reiterated their written comments that, if DOE continues to classify golf car battery charger systems as consumer products, they believe that adequate implementation time must be given from the final rule to the effectiveness date, which, at a minimum, would be 2 years.
10. Lester Electrical stated that the NOPR includes language that indicates that DOE has tentatively concluded that a 2-year window between the announcement of the final rule and compliance with the standards is sufficient for battery charger manufacturers to meet the efficiencies proposed in the NOPR.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Spencer Stock', written in a cursive style.

Spencer Stock  
Product Marketing Manager  
Lester Electrical  
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